

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL INDICTMENT
)	NO. 1:18-cr-00098
MITZI BICKERS,)	
)	
Defendant.)	

MOTION TO CONTINUE SENTENCING DATE

COMES NOW the defendant, Mitzi Bickers, by and through undersigned counsel and moves that her sentencing date be continued for the following reasons:

1.

This case is currently set for sentencing on July 12, 2022 at 10:00 a.m. before the Honorable District Court Judge Steven C. Jones.

2.

The initial presentence report was disclosed to counsel on June 15, 2022¹. As the Court is aware, this is a sentencing following a multi-week jury trial for which there was a split-verdict as well as multiple counts of

¹ The disclosure was 8-days past the 35-day requirement as per F.R.C.P. 32 and counsel had been in communication with probation officer Logan regarding her needing additional time.

conviction. Therefore, the guideline calculations and other issues to be litigated at the time of sentencing in this matter are complex. Due to the complexity as well as the late disclosure, Ms. Bickers requests more time to submit her objections and for her sentencing date to be continued.

3.

Undersigned counsel has spoken to AUSA Jeffrey Davis regarding this request and he has indicated that the government has no objection to the continuance.

Respectfully submitted,

s/Drew Findling

Drew Findling
Georgia Bar No. 260425

s/Marissa Goldberg

Marissa Goldberg
Georgia Bar No. 672798

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of the within and foregoing Motion:

MOTION TO CONTINUE SENTENCING DATE

By electronic service:

AUSA Nathan Kitchens
AUSA Jeffrey Davis
AUSA Tiffany Dillingham

This 22nd day of June, 2022.

Respectfully submitted,

s/Marissa Goldberg

Marissa Goldberg
Georgia Bar No. 672798